

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

CHRISTOPHER CHIRAS
Plaintiff,

v.

ASSOCIATED CREDIT SERVICES, INC.,
Defendant.

CIVIL ACTION NO.

NOTICE OF REMOVAL

Please take notice that the Defendant Associated Credit Services, Inc. (“Associated”) pursuant to 28 U.S.C. § 1441(a), hereby removes this action to the United States District Court for the District of Massachusetts, upon the following grounds:

1. On or about April 6, 2012, Plaintiff filed his Complaint against Associated in the District Court, Worcester County, entitled Christopher Chiras v. Associated Credit, designated as Case No. 2012 CV 620 (the “State Court Action”).

2. Plaintiff served his Summons and Complaint on Associated on April 25, 2012. Copies of all process and pleadings served upon Associated are being filed as required by 28 U.S.C. § 1441(a), and are attached as Exhibit A.

3. The Complaint alleges an action for damages based upon alleged violations of “Fair Debt Practices Act” presumably the Fair Debt Collection Practices Act, codified at 15 U.S.C. § 1692 et seq. Plaintiff seeks an award of statutory damages and costs.

4. Pursuant to 28 U.S.C. § 1331, this Court has original jurisdiction based on the existence of a question of federal law, and this action is removable under 28 U.S.C. § 1441(b). Venue properly lies in the District of Massachusetts under 28 U.S.C. § 1391(a)(2).

5. Pursuant to 28 U.S.C. § 1446(b), this Notice is timely filed with this Court, within thirty days after the receipt by Associated of a copy of the initial pleading setting forth the claim for relief upon which this action is based.

6. As required by 28 U.S.C. § 1446(d), written notice of removal is being given to all adverse parties and a copy of the notice is being filed with the Clerk of the District Court, for the Commonwealth of Massachusetts, Worcester County.

For these reasons, the Defendant Associated Credit Services, Inc. requests that the State Court Action be removed from the District Court for the Commonwealth of Massachusetts, Worcester County to the United States District Court for the District of Massachusetts, and proceed as an action properly removed to that Court.

Dated: May 15, 2012.

ASSOCIATED CREDIT SERVICES, INC.

By its attorneys,

/s/ John J. O'Connor

John J. O'Connor

BBO # 555251

PEABODY & ARNOLD LLP

Federal Reserve Plaza

600 Atlantic Avenue

Boston, MA 02210-2261

(617) 951-2100

joconnor@peabodyarnold.com

Dated: May 15, 2012.

CERTIFICATE OF SERVICE

I, John J. O'Connor, hereby certify that on the 15th day of May, 2012, I served the attached Notice of Removal by causing a copy thereof to be sent via first class mail on the following:

Chris Chiras
61 Sandra Drive
Worcester, MA 01604

/s/ John J. O'Connor
John J. O'Connor

767225_1
15133-96308